

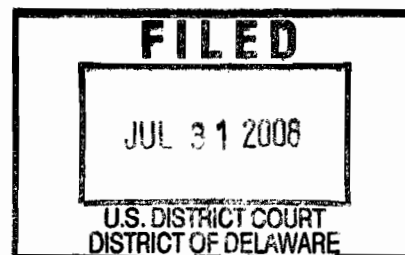
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ADAM WENZKE  
PLAINTIFF

v.

CORRECTIONAL MEDICAL  
SERVICES ET. AL.  
DEFENDENTS

CIV. ACTION No. 07-504-SLR



RD scanned

NOTICE OF INTERROGATORY

PLEASE TAKE NOTICE THAT PURSUANT TO RULE 33, FED. R. CIV. P. THE PLAINTIFF SUBMITS THE FOLLOWING INTERROGATORIES TO THE DEFENDENT JIM WELCH, SUPERVISOR OF C.M.S. TO ANSWER EACH OF THE ATTACHED INTERROGATORIES IN WRITING UNDER OATH, WITHIN 30 DAYS OF SERVICE.

July 29, 2008

DATE

ADAM WENZKE #183595

PLAINTIFF

DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DE 19977

## INTERROGATORIES - JIM WELCH

- 1) EXPLAIN AND DESCRIBE YOUR DUTIES AS THE DIRECTOR OF HEALTH CARE SERVICES AT H.R.Y.C.I. AND HOW LONG YOU'VE WORKED THIER ?
- 2) EXPLAIN AND DESCRIBE WHY THAT AFTER PLAINTIFF NOTIFIED YOU NUMEROUS TIMES OF HIS PAIN AND SUFFERING YOU FAILED TO RESPOND OR USE YOUR AUTHORITY TO HELP HIM ?
- 3) EXPLAIN AND DESCRIBE ANY TREATMENT THAT YOU KNOW OF THAT WAS ADMINISTERED TO THE PLAINTIFF CONCERNING HIS MEDICAL CONDITION AND WHO TREATED HIM ?
- 4) EXPLAIN AND DESCRIBE WHY YOU FAILED TO RESPOND WHEN YOU FOUND OUT PLAINTIFF WON HIS MEDICAL GRIEVANCE APPEAL TO THE BUREAU CHIEF RICHARD KEARNEY TO BE SENT BACK TO SEE THE UROLOGIST ?
- 5) TO YOUR KNOWLEDGE EXPLAIN AND DESCRIBE WHY YOU THINK THE PLAINTIFF WAS RECEIVING ADEQUATE MEDICAL CARE ACCORDING TO C.M.S.'s RULES OF MEDICAL PROCEDURES MANUAL AND THE ACCEPTED PROFESSIONAL STANDARDS OF THE NATIONAL COMMISSION ON CORRECTIONAL HEALTH CARE ?
- 6) EXPLAIN AND DESCRIBE IF YOU INVESTIGATED PLAINTIFF'S CLAIMS OF PAIN AND SUFFERING, AND WHAT YOU DID ABOUT IT ?

- 7) EXPLAIN AND DESCRIBE IF YOU ARE AWARE THAT THE MEDICAL STAFF YOU ARE SUPERVISING ARE TREATING PEOPLE WITHOUT THEIR "INFORMED CONSENT", AND MEDICAL DID NOT TELL THE PLAINTIFF ANYTHING ABOUT THE LONG AND SHORT TERM SIDE EFFECTS OF TAKING TYLENOL WHILE BEING CO-INFECTED WITH TWO TYPES OF STRAINS OF THE HEPATITIS C VIRUS?
- 8) EXPLAIN AND DESCRIBE THE POSSIBLE RISKS THAT YOU DELEGATED DOWN TO YOUR SUBORDINATES CONCERNING PLAINTIFFS MEDICAL TREATMENT OPTIONS?
- 9) EXPLAIN AND DESCRIBE ANY AND ALL TRAINING THAT THE MEDICAL PERSONNEL HAD WENT THROUGH BEFORE THEIR ALLOWED TO BE ELIGIBLE TO WORK FOR YOU IN A PRISON MEDICAL ENVIRONMENT?
- 10) EXPLAIN AND DESCRIBE ANY BONUSES OR INCENTIVES YOU WERE OFFERED OR RECEIVED OR KNOW ABOUT THAT YOUR EMPLOYER OFFERS OR USES TO MINIMIZE HIGH COST TREATMENTS ESPECIALLY TO THOSE WHO REQUIRE HOSPITALIZATION OR THE CONSULTATION OF SPECIALISTS?
- 11) EXPLAIN AND DESCRIBE HOW YOU REACTED AND WHAT YOU ACTUALLY DID WHEN YOUR OWN MEDICAL PERSONNEL PUT YOU ON OFFICIAL NOTICE OF PLAINTIFF'S PAINFUL CONDITION AND REPEATED REQUEST TO SEE THE UROLOGIST AGAIN?

- 12) AFTER PLAINTIFF WAS SEEN BY THE UROLOGIST ON NOV. 16 2006 AND FELT A SMALL MASS ON THE TESTICLES, THE UROLOGISTS ORDERED A ULTRA SOUND AND FOLLOW UP APPOINTMENT EXPLAIN AND DESCRIBE WHY AND THE REASONS BEHIND THE FOLLOW UP CANCELLATION?
- 13) EXPLAIN AND DESCRIBE WHO'S DECISION IT WAS TO TELL THE PHYSICIANS ASSISTANT MICHAEL SENISCH TO WRITE ON (PREVIOUSLY FILED SIX CALL EXHIBIT X-19 PRISON MEDICAL RECORDS) THAT PLAINTIFF WOULD FOLLOW UP WITH THE UROLOGIST WHEN PLAINTIFF WAS RELEASED IN ONE MONTH, AND IN REALITY PLAINTIFF HAD 28 MONTHS LEFT ON HIS SENTENCE?
- 14) EXPLAIN AND DESCRIBE IF C.M.S. HAS A CUSTOM OR POLICY ON THE COURSE OF MEDICAL TREATMENT PLAINTIFF RECEIVED AND IS THERE A CUSTOM OR POLICY OF FINANCIAL CONSIDERATIONS BEING PLACED OVER MEDICAL TREATMENT NEEDS?
- 15) EXPLAIN AND DESCRIBE WHERE YOU RECEIVED YOUR LICENCE AND TRAINING TO BE THE DIRECTOR OF HEALTH CARE AND HOW LONG YOU'VE HAD IT?
- 16) IN YOUR OWN MEDICAL OPINION EXPLAIN AND DESCRIBE IF YOU THINK ITS SAFE FOR A PATIENT CO-INFECTED WITH TWO DIFFERENT TYPE STRAINS OF THE HEPATITIS C VIRUS TO BE GIVEN MASSIVE AMOUNTS OF TYLENOL FOR OVER 4 YEARS?



- 17) EXPLAIN AND DESCRIBE WHEN THE 2ND ULTRA SOUND RESULTS FROM DEC 18, 2006 CAME BACK AND REVEALED PAINFUL BILATERAL CYSTS ON BOTH EPIDIDYMEDES OF THE TESTICLES AND POSSIBLE INTERMITTENT TORSION OF THE RIGHT TESTICLE WHY WAS PLAINTIFF KEPT ON Tylenol AND HIS COMPLAINTS IGNORED THAT THE Tylenol WASN'T WORKING AND HE WAS IN SEVERE PAIN AND HAS BEEN FOR THE PAST 2 YEARS 7 MONTHS AT THAT TIME?
- 18) EXPLAIN AND DESCRIBE TO YOUR KNOWLEDGE IF YOU OR YOUR COMPANY HAS EVER EMPLOYED UNER QUALIFIED OR UNLICENSED MEDICAL PERSONNEL?
- 19) EXPLAIN AND DESCRIBE IF ANY UNQUALIFIED OR UNLICENSED PERSONNEL WORKED AT H.R.Y.C.I. FROM FEB. 23, 2005 THROUGH SEPT. 11, 2007?
- 20) EXPLAIN AND DESCRIBE WHO'S JOB IT IS TO SCHEDULE OUTSIDE MEDICAL APPOINTMENTS, CANCEL OUTSIDE APPOINTMENTS?
- 21) EXPLAIN AND DESCRIBE WHO HAS THE AUTHORITY TO DENY OR APPROVE MEDICAL APPOINTMENTS OR DENY OR APPROVE ANY RECOMMENDED TREATMENT BY A PHYSICIAN ON THE OUTSIDE WORLD OR AT H.R.Y.C.I.?
- 22) EXPLAIN AND DESCRIBE IF YOU KNOW ANYTHING ABOUT PLAINTIFF BEING TRANSFERRED TO ANOTHER PRISON BECAUSE HE COMPLAINED TO MEDICAL TOO MUCH?

RESPECTFULLY,

Adam Wenzke  
PLAINTIFF

July 29, 2008  
DATE

ADAM WENZKE #182595  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DE 19977

## CERTIFICATE OF SERVICE

I ADAM WENZKE, HEREBY CERTIFY THAT I HAVE SERVED A TRUE COPY OF THE 1 NOTICE OF  
INTERROGATORIES UPON THE FOLLOWING PARTIES:

1) DEPARTMENT OF JUSTICE  
ORNELIA M. WATERS  
820 N. FRENCH ST  
WILM, DE 19801-3509

2) OFFICE OF THE CLERK  
U.S. DISTRICT COURT  
844 N. KING ST. Lockbox 18  
Wilm, DE 19801-3570

By PLACING SAME IN A SEALED ENVELOPE, AND DEPOSITING SAME IN THE U.S. MAIL AT THE DELAWARE CORRECTIONAL CENTER, SMYRNA DE 19977

ON THIS 29 DAY OF July 2008

Adam Wenzke